GULF RESTORATION NETWORK

UNITED FOR A HEALTHY GULF

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Ms. Emelise Cormier
DEQ Office of Environmental Assessment
Water Quality Assessment Division
Post Office Box 4314
Baton Rouge, Louisiana 70821-4314

Re: TMDL for Biochemical Oxygen-Demanding Substances and Nutrients for the Bayou Pointe Au Chien Watershed (subsegment 120605)

Dear Ms. Cormier,

On behalf of the Gulf Restoration Network (GRN), I am submitting the following comments regarding the total maximum daily load (TMDL) for the above-mentioned water segment. The GRN is a diverse coalition of 50 local, regional, and national organizations committed to uniting and empowering people to protect and restore the resources of the Gulf of Mexico. Members of the GRN are located in each of the states along the Gulf of Mexico.

Permit limits and monitoring on the Pointe au Chien School should be more protective.

It is troubling that this TMDL report effectively ignores the single point source of pollution going into Bayou Pointe au Chien. We feel that a more extensive survey of this point source should be done. In the report it is stated that the actual outflow of this wastewater was not measured because it was not flowing during the survey period of July 22-28, 2003. Given the fact that during low flow conditions, this output could conceivably be the *only* flow in the Bayou, this outflow should be measured and the water quality of the effluent improved to a large extent. In the sampling that took place in the preparation of this report, the closest sampling point to the school was upstream of the outfall. In order to achieve an accurate picture of the impacts of the point source, sampling should take place downstream of the point source, when it is in full operation. This all assumes that the actual discharge from this school has been specifically located; the TMDL states that “the facility is *believed* to discharge to the named bayou via a pipe” (italics added). This implies that this discharge was not specifically located before it was deemed insignificant in its impacts—this discharge point must be specifically located.

In addition, the current limits permitted to Pointe au Chien School violate current water standards. According to Bayou Pointe au Chien's Numerical Criteria, the minimum Dissolved Oxygen (DO) is 5 mg/L, however this TMDL's recommendation states that the facility should continue to discharge with a minimum DO of 2 mg/L. Given the fact that the whole goal of this watershed clean up plan is to raise the DO, this discharge should exceed the minimum numeric criteria.

The current Dissolved Oxygen standard should not be reduced.

Throughout this TMDL, it is stated that "a more appropriate DO standard for Pointe au Chien should be established." Given the information in the report, we do not necessarily agree. The authors often characterize the Bayou as a roadside ditch for drainage, and therefore say it should have a lower DO standard. However, it also states that the non-point loading comes almost exclusively from man-made sources. While reducing these sources to achieve the 5 mg/L DO standard might be "difficult to achieve," it should be attempted before defaulting to conducting a Use Attainability Analysis to weaken the standard.

Thank you for your consideration of these comments in the formulation of the TMDL that will be submitted to EPA Region 6 for final approval. We look forward to receiving your response on this very important matter.

Respectfully submitted,

Matt Rota
Assistant Director, Water Resources Program
Gulf Restoration Network

CC: Sunita Singhvi, EPA Region 6
Michael Morton, EPA Region 6
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